

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

R2 SOLUTIONS LLC,

Plaintiff,

v.

DATABRICKS, INC.,

Defendant.

Civil Action No. 4:23-cv-01147-ALM

**JURY TRIAL DEMANDED**

**DECLARATION OF ABHINAV TANEJA IN SUPPORT OF DEFENDANT'S  
MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

[REDACTED]

I, Abhinav Taneja, declares as follows:

1. My name is Abhinav Taneja. I am a citizen of the United States and am at least eighteen years of age. I have personal knowledge of and am competent to testify as to the facts herein.

2. I have been an employee at Databricks, Inc. (“Databricks”) since 2021. I am currently Vice President of Research & Development Operations (“R&D Operations”) of Databricks.

3. In my role as Databricks’ Vice President of R&D Operations, I am familiar with Databricks’ research, development, design, marketing, distribution, and sales of its products and services. I am based in the San Francisco Bay Area, California.

4. Databricks is a Delaware corporation, and is and has always been headquartered in the San Francisco Bay Area, California. Databricks maintains three offices in Northern California, including in San Francisco, Mountain View, and Berkeley. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. I understand that the Plaintiff in this case, R2 Solutions LLC, filed a complaint that identifies the “Databricks Data Intelligence Platform/Databricks Lakehouse Platform, and any other platform(s) offered or provided by Databricks that utilize Apache Spark or any other similar functionality” as the “Accused Instrumentalities.”

6. Apache Spark started as a research project at the University of California Berkeley (“UC Berkeley”) in 2009. UC Berkeley is located in the San Francisco Bay Area, California.

[REDACTED]

Apache Spark is an open-source analytics engine used for big data workloads and machine learning. The Apache Spark project was made available as open-source software in 2010 and donated to The Apache Software Foundation in 2013.

7. Databricks was founded in 2013 in the San Francisco Bay Area, California. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The Databricks Platform was designed and developed to implement Apache Spark, and such design and development was done primarily by Databricks engineers based in Northern California. [REDACTED]

[REDACTED]

[REDACTED]

9. The Databricks Platform was designed and developed to utilize Apache Spark, and such design and development occurred primarily in Northern California. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11. Documents concerning the design, development, and operation of the Databricks Platform (including source code), as well as any financial documentation, are primarily generated in the San Francisco Bay Area, California.

12. Databricks has a small WeWork location in Plano, Texas. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Mountain View, California, on May 21, 2024.

*Abhinav Taneja*

\_\_\_\_\_  
Abhinav Taneja

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on May 21, 2024. Additionally, I hereby certify that all counsel of record who consented to electronic service are being served with a copy of this document via electronic mail per Local Rule CV-5.

/s/ Michael J. Sacksteder

Michael J. Sacksteder